NOTES FROM BASE REALIGNMENT AND CLOSURE TEAM MEETING DATED 11 JUNE 2001 CNC CHARLESTON SC

6/22/2001

CH2MHILL

June 2001 BCT Meeting Minutes
Charleston, South Carolina

PREPARED FOR: Charleston Naval Complex BCT
PREPARED BY: Tom Beisel
DATE: June 22, 2001

The June 2001 BCT Meeting was held at the South Carolina Department of Health and Environmental Controls (DHEC) offices in Columbia, South Carolina. The meeting began at 1315 on June 11, 2001, and concluded at noon on June 12, 2001.

Monday June 11, 2001

Introductions

The new DHEC team member Jamelle Ellis was introduced to the Team. Mihir Mehta will be leaving the Team within a week because he is transferring to a different department within DHEC.

Update on Field Activities

The Team was updated on the current status of field activities at CNC.

- AOC 607 MIP results

Paul Favara and Tom Beisel updated the team on the current interpretation of the data recently collected at SMWU 607. Paul presented a 3-demintional representation of the PCE plume and stratigraphy underlying the site.

- AOC 700 excavation activities are done - the completion report is in progress.
- AOC 518 excavation activities are done - the completion report is in progress.
- Zone F and H RFI Addendum sampling is complete except for sampling the 4 new wells.
- AOC 709H resampling- Dean Williamson updated the team on the proposed path forward at 709H. The original PCB hits appear anomalous. Resampling did not confirm a PCB issue at this site. CH2M Hill proposes to address this site not as an IM but in the RFI addendum. Stacy requested that CH2M Hill explain in the RFI Addendum why this analytical anomaly may have occurred. CH2M Hill agreed that they provide rationale that may explain this in the RFI Report Addendum , but that it is not always possible to fully explain every anomolous value.

- SWMU 11 work plan for lead sampling. Dean Williamson updated the team on why we were sampling at SMWU 11 for lead. Work will begin this Monday. CH2M Hill is doing this to provide adequate data for decision making..
- SWMU 44- Paul Favara updated the team on the additional soil sampling at this site for Arsenic.

Overview of RFI Report Addendum Format

Dean presented to the Team for discussion CH2M Hills proposed approach for RFI Report Addendum generation.

Section 1 provides overview of the site and report purpose

Section 1 will present the purpose of RFI addendum. The purpose of the RFI addendum is to present additional data collected since rev 0, refine COPC/COC list, address closeout issues, and provide recommendations.

Section 1 will include:

- Site description use and history
- Summary info from rfa
- Potential contaminates identified in the RFA and RFI WP
- Site location map fig 1-1
- Site layout and aerial photo fig 1-2
- RFI status

Paul Bergstrand wants a groundwater potentiometric figure for reference somewhere in the report.

Section 2 Summarizes Rev 0 RFI report

Overall summary of RFI work to include: samples collected, analyses performed, and figure showing sampling locations. There will be no risk assessment refinement in this section.

Section 2.1- surface soil results; summary of analyses and description of screening criteria (residential RBCs etc).

Section 2.2- subsurface soil results; summary of analyses and description of screening criteria (SSLs, etc).

Section 2.3- groundwater results; summary of analyses and description of screening criteria.

Section 3 describes any IMs completed

Section 3 will provide an overview of the completed IM. This summary will include:

- Purpose and objective of the IM
- Summary of work completed and results;

- IM completion report typically will be include as an appendix

Mihir asked if UST data reference should be included in the RFIs. David wants to see references in the addendum for applicable reports. Tony will be giving CH2M Hill a list correlating the UST sites previously completed with SWMUs. UST data references will be included in the RFIs.

Section 4 describes sampling and results since rev o RFI

Summary of sampling and analysis completed after Ensafe's submittal of a RFI. This section will include:

- Objectives of additional sampling
- Figures showing sampling
- Data tables

Section 5 Presents the COPC/COC refinement

This section will include:

- Discusses COPC/COC identified in rev 0 RFI
- Discusses all data collected as appropriate
- Evaluates data based on current screening criteria
- Evaluates exposure points etc

Section 6 site close out issues

This section will include:

- RFI status
- Inorganics in groundwater
- Linkages to sanitary sewer, stormwater system and rail roads.

Section 7 recommendations NFA. LUC and CMS

Mihir asked Stacy if CMS is required for LUC. Stacy says CMS is not always necessary. Dean says CMS would be very limited in scope to justify LUC. Dan says if there are any questions about LUC then we should do the CMS. David says the executive sponsor team agreed that where applicable, analysis of no LUC would still be explored. David also says the executive sponsors said to be flexible within the law and that where appropriate we should evaluate with a CMS. A Focused CMS can be added as Section 9 of the RFI report addendum.

Navy and DHEC have been talking internally about master LUC general guidance procedures; Dean requests some sort of general guidance/check list.

Stacy says the DHEC can not approve a remedy until the master LUC management plan has been agreed too. DHEC and the Navy will push the finalizing the master LUC management plan for CNC.

Section 8 (optional focused CMS)

Section 9 references

Appendices

Dean asked the team what is required for the lab back up. Appendix will include:

- database print out of analytical results of new samples only
- boring logs and well logs for new borings and wells
- data validation reports
- excerpts of referenced portions of rev 0 RFI report
- IM completion report

CH2M Hill will discuss with Susan Byrd format for the risk assessment tables.

I-26/Remount Road redevelopment plan and implications for remedial planning

Tony Hunt presented to the team the status of the I-26 Remount Road redevelopment. Remount Road access to I-26 will be updated to help with traffic flow. Addition of an off ramp from I 26 south onto the Remount Road. Will impact northern corner of Naval Annex property. Construction likely planned for next years. Additional second lane of on ramp to I-26 southern flow. DOT is looking at what site conditions exist that will keep work from beginning.

Paul B concerned about any changes to groundwater flow patterns that would effect the TCE plume.

Tuesday June 12, 2001

SWMU 42 Proposed MCS for Arsenic

Paul Favara presented the rational for the proposed As MCS.

The statistically estimated Zone A reference concentration for arsenic, as presented in the Final Zone A RFI, was 9.44 mg/kg. The Zone A reference concentration was a UTL 95%value, after the three highest grid data point (30.1 mg/kg) were removed from the sample population.

The highest concentration data points were removed from the reference sample population because it was considered an "outlier." However, sense this sample is representative of anthropogenic background conditions at the base, it should be included in the background evaluation. Therefore, as discussed at the BCT Meeting in June, the full range of arsenic results from grid locations was evaluated. The resulting UTL95% from the full data set was calculated as 29.0 mg/kg.

Additional soil samples were collected in March 2001 to characterize BEQ concentrations at railroad tracks; arsenic was also targeted for analysis in these samples. The railroad samples included samples from near/under railroad ties, and adjacent runoff areas. Two of the railroad track samples were collected from areas adjacent to Zone A.

The arsenic concentrations in the two samples ranged from 2.04 to 41.0 mg/kg. Since SWMU 42 has extensive railroad tracks running through the site, and some of the highest observed arsenic concentrations were near the railroad tracks, these railroad sample concentrations were included in a UTL95% calculation for Zone A. When all the "non-SWMU" (i.e., original grid samples as well as railroad samples collected in March 2001) samples are included in the UTL95% calculation, the new UTL95% was calculated as 41 mg/kg.

In addition to the above site-specific information, another factor to consider in development of a MCS is a recent position EPA Region IV has taken on arsenic. This position was outlined in a letter prepared by Dann Spariosu and submitted to Mihir Mehta of SCDHEC. The letter recommends a remediation goal of 20 mg/kg for arsenic in soil and cites a general range of arsenic background of 10 to 30 mg/kg within EPA Region IV.

Given the above information, CH2M-Jones recommends a MCS for arsenic be set at 29 mg/kg. The basis of this recommendation is:

- the proposed MCS represents the UTL95% for the original reference sample population; and
- the value is less than the upper end of the background range of arsenic with in Region IV (i.e., 30 mg/kg).

Though inclusion of the new (March 2001) railroad samples is applicable in the development of a MCS for SWMU 44, the new data have not been included as a conservative measure.

It should be noted that developing a SSL based MCS was considered. Using EPA default assumptions, and a DAF of 10, the SSL for arsenic in soil is 14.5 mg/kg. As this value is less than the reference concentration of 29 mg/kg, the reference concentration would be the more relevant than the SSL in deriving a MCS.

The Team agreed that CH2M Hills approach was acceptable.

Team agreed that R.R. track related PAHs are not covered well under RCRA. After some discussion, the Team agreed that LUCs would be the best route for dealing with the R.R. tracks due to existing land uses as R.R.. Risk does exist if future land use changes from R.R. tracks to other use. Stacy requested that DHEC discuss this issue internally due to her concerns about future interpretations of this definition.

Vijaya clarified for the team that LUCs are not for SMWU 42 but only for RR tracks. SMWU 42 cleanup will be to residential future use scenario.

Paul clarified the changes made to the IM approach from what was originally proposed in January based on the Teams revised risk assessment approach . Rev 0 which was based on remediating all soil that exceeded 14.2 mg/kg As) proposed 1600 cy. The current plan, using a risk-based approach, and MCS of 29 mg/kg As, is approximately 200 cy.

The MCS definition presented to the BCT was accepted by David S. It was agreed that CH2M Hill should submit the Rev 1 SMWU 42 IMWP with the presented approach to MCS.

Action items: SC and EPA will address the RR track issue internally to see how RR should be approached in the future.

Well maintenance program for CNC

Ensafe handed out a print out of the well assessment program implemented by Ensafe to asses the condition of the wells at CNC. Scope did not include wells installed after Fall of 2000. Pete Bailey and Adam Stein from Ensafe provided a presentation on the status of this activity.

Adam Stein walked the team through the well maintenance GIS application. In summary 16 wells were replaced; 6 wells were abandoned and not replaced. DHEC and Ensafe agreed that any wells asphalted over were considered abandoned. Ensafe will provide backup for any communications and approvals with DHEC.

FOSL for Dry Docks 3&4 and Bldg 68

Steve Parker with Ensafe presented a discussion of the FOSL for building 68 and dry docks 3 and 4.

Building 68: Additional work is underway to complete the Zone F RFI that will address the remaining concerns at this building.

Dry Docks 3 and 4: Developer intends to pave the area around dry docks 3 and 4. Navy is concerned about possible exposures associated with elevated Pb in soils around the battery cracking area. Additional sampling is likely required to finish assessment of the nature and extent of Pb in soils at the site. DHEC wants information on any future planned actions at the sites related to additional characterization or IM's. Addition investigations must be completed before DHEC can approve the FOSL. Zone E evaluation for the completion of the RFI will include a discussion of future remedial actions needed for the sites.

Meeting Recap and Wrap up

Action Items:

Tony volunteered to coordinate the discussion on the subject of Land Use Controls. Issues discussed include:

a.) from the Department's perspective, how to incorporate Land Use Controls into the permit;
b.) from the Navy's perspective, does inclusion in the permit then constitute a permit condition subject to enforcement action as any other violation; and
c.) are there other means of conducting the corrective action and implementing Land Use Controls other than continuation of the RCRA permit.

SC and EPA will address the RR track issues internally to see how RR should be approached in the future. Dan checking internally about EPA guidance on rail road tracks.

Tony will be giving CH2M Hill a list correlating the UST sites previously completed with SWMUs.

CH2M Hill will look at Ensafe's well maintenance program.

AOC 518 report will be expedited to DHEC.

Kris Garcia will look at the Zone E RD plan.

Tony will provide information on the meeting proposed for the I-26 interchange improvement project .

Ensafe will issue a formal letter stating which monitoring wells were abandoned as a result of the well condition review.